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[Comments on Better Controls over Biomedical Research].
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Letter to Frederick Seitz, President, Rockefeller Univ., New York, NY; by Elmer B. Staats, Comptroller General.

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

OCT 1 1976

Mr. Frederick Seitz
President, The Rockefeller
University
New York, New York 10021

Dear Fred:

Thank you very much for your letter of September 15, 1976. I appreciate your thoughtfulness in taking the time to share with us your comments on our report "Better Controls Needed Over Biomedical Research Supported by the National Institutes of Health."

I am, however, somewhat concerned by your observation that we seem to be recommending sweeping changes in the operating procedures of NIH's extramural research program. As you noted, NIH generally funds approved projects of grantees for 3 years. After the approval period expires, applications for continued financial support are treated as new grant applications and grantees must again compete for funding. We are not recommending that NIH abandon the concept of the 3-year funding cycle and change to a system by which approved projects annually compete with new proposals for funding.

As noted in Chapter 2 of the report, we do question whether an approved 3-year project should be funded annually on a basis that is virtually automatic especially when many unfunded competing grant applications have significantly greater specific merit, as evidenced by the priority scores assigned by scientific authorities, than some noncompeting grants which continue to be funded. Further, at the three institutes we reviewed, about 44 percent of the noncompeting grants were not funded again after their approval period expired because, when competing with other grant applicants, their priority scores indicated they were of lower scientific merit.

In light of these facts, we believe that NIH could better assure that the grants being funded were those with the greatest scientific merit, if a system were developed to identify noncompeting grants having significantly less scientific merit than approved unfunded competing grant applications. This system could use normalized priority scores. Once a system is developed to identify noncompeting grants with less scientific merit, grant funding should not be automatically discontinued, because other factors may make it desirable to continue the funding. We believe, however, that the advantages and disadvantages of continuing to fund such noncompeting grants should be assessed before funds are denied to applications with greater scientific merit.

NIH regulations already require that researchers submit annual progress reports. NIH grant administrators, who have scientific backgrounds, are to provide overall surveillance and management of projects using (1) annual progress reports, (2) publications resulting from research, and (3) personal contact with the grantee. As noted in the report, the process needs to be improved. If NIH grant administrators critically reviewed noncompetitive multiyear research grants, those with poor progress and/or relatively low scientific merit could be identified. After such grants are identified, they should be further assessed and a decision made as to whether to continue funding. Grantees would not be required to submit new applications each year for consideration by means of the formal NIH review process.

In simple terms, all we are asking is that NIH grant administrators review the ongoing grants each year, as already required by NIH regulations, identify those with poor progress or low scientific merit, and make an assessment as to whether funding should continue. As noted above, the universe of projects to be assessed is rather small and should not impose a major workload on NIH or disrupt the scientific community. Nevertheless, we continue to believe that the procedural changes will help insure that science resources are used for projects with the greatest scientific merit.

Again, thank you for your views. I hope this letter helps clarify what we are trying to achieve through our report.

< Sincerely yours,

SIGNED/ ELMER B. STAATS

Comptroller General
of the United States